

STATE OF COLORADO

(b) (7)(C), (b) (6)

Executive Director and Chief Medical Officer

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

January 27, 2012

(b) (7)(C), (b) (6)

**Subject: Inspection Report for the December 16, 2011 Compliance Evaluation
Inspection; EPA Identification Number COR000216655**

Dear (b) (7)(C),
(b) (6)

Thank you for your cooperation regarding the hazardous waste inspection conducted at your facility on the above date. No violations were noted on the day of the inspection and the Division does not intend to take any action regarding the inspection.

Attached for your records is a copy of the inspection checklist that serves as an inspection report. Please contact me at (b) (7)(C), (b) (6) if you have any questions regarding this matter.

Sincerely,

(b) (7)(C), (b) (6)

Hazardous Waste Compliance Unit

ATTACHMENT 1
Inspection Report

2011 SMALL QUANTITY GENERATOR (SQG) SELF-CERTIFICATION INSPECTOR CHECKLIST

Date of Inspection: 12/16/2011

For Dept Use Only _____

Company Name: Abound Solar, Inc.

EPA ID#: COR000216655

Physical location (address) of the facility: 4557 Denrose Court, Unit B

City: Fort Collins

State: CO

Zip: 80024

Company Contact: (b) (7)(C), (b) (6)

Telephone: (b) (7)(C), (b) (6)

Company Contact E-mail: (b) (7)(C), (b) (6)

Business Owner: Abound Solar, Inc.

Owner Telephone: 303-682-6110

Primary Products or Services: PV solar panel research

Number of Employees: 20 Years at This Location: 5 yrs Hours of Operation: M-F 8am-6pm

Inspection Type: Random ☒ Non-Responder ☐ Other ☐

Notification Status: LQG ☐ SQG ☒ CESQG ☐ OTHER ☐

Generator Status on Day of Inspection: CESQG ☐ SQG ☒ LQG ☐ OTHER ☐

A.	General	YES	NO	N/A
1.	Has this facility determined which wastes generated at their facility are hazardous wastes and which wastes are not hazardous wastes? (Sec. 262.11)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2.	Does the physical address at their facility match the address associated with their EPA Identification Number? (Part 99 & Sec. 262.12)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3.	Does their facility use a transporter that is authorized to transport hazardous waste? (Sec. 262.12 (c))	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.	Does their facility dispose of all hazardous waste through a permitted treatment, storage and disposal facility? (Sec. 100.10)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
5.	Does their facility ensure that no hazardous waste is disposed of on the ground, or to a sanitary sewer, storm drain, bodies of water, or in the trash? (Sec. 100.10)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
6.	Do they either dispose of contaminated rags and shop towels as hazardous waste or send them to a commercial laundry service if the rags have been in contact with certain hazardous F- listed solvents like MEK or toluene? (Sec. 100.10)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.	Do they manage their fluorescent lights, batteries, computers, aerosol cans and mercury containing devices as hazardous waste or universal waste instead of throwing them into the trash? (Part 273 & Sec. 100.10)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

**2011 SMALL QUANTITY GENERATOR (SQG)
SELF-CERTIFICATION
INSPECTOR CHECKLIST**

B.	Waste Stream Description (Sec. 262.11)	Approximate Amount Generated During Busiest Month		
		Quantity	Gallons	Pounds
1.	methyl ethyl ketone (D001, F005)	55	<input checked="" type="radio"/>	<input type="radio"/>
2.	cadmium (D006)	350	<input type="radio"/>	<input checked="" type="radio"/>
3.	flammable liquids (isopropyl alcohol D001, F003)	112	<input type="radio"/>	<input checked="" type="radio"/>
4.	Waste solids (D001, D006, F006)	150	<input type="radio"/>	<input checked="" type="radio"/>
5.	Cadmium solids (D006)	350	<input type="radio"/>	<input checked="" type="radio"/>

C.	Used Oil Management	YES	NO	N/A
1.	Are containers of used oil marked with the words "Used oil"? (Sec. 279.22)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2.	Are all used oil spills and releases cleaned up immediately and properly managed? (Sec. 279.22)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3.	Has their facility taken the measures specified in the guidance document to prevent the release of used oil to the environment? (Sec. 279.22)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.	Are all containers used to store used oil outside kept closed except when adding or removing waste? (Sec. 279.22)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

D.	Hazardous Waste Container Management	YES	NO	N/A
1.	Are all containers used to store hazardous waste labeled with the words "Hazardous Waste"? (Sec. 262.34 (a)(3) & 262.34 (d)(4))	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2.	Are all hazardous waste containers, except satellite accumulation containers, marked with the date when the first drop of hazardous waste is added to the container? (Sec. 262.34 (a)(2) & 262.34 (d)(4))	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3.	Are all containers used to store hazardous waste in good condition (not rusted, dented, bulging or leaking)? (Sec. 262.34 (d)(2) & 265.171)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.	Are all containers used to store hazardous waste kept closed except when adding or removing waste? (Sec. 262.34 (d)(2) & 265.173 (a))	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
5.	Do they inspect weekly, and correct any issues noted, all containers that are used to store hazardous waste and look for: containers in poor condition, leaking containers, compatibility of wastes, hazardous waste labels, accumulation start dates, and ensure that the containers are closed? (Sec. 262.34 (d)(2) & 265.174)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

**2011 SMALL QUANTITY GENERATOR (SQG)
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D.	Hazardous Waste Container Management	YES	NO	N/A
6.	Are incompatible wastes segregated from each other? For example, are acids and bases stored separately? (Sec. 262.34 (d)(2) & 265.177(c))	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.	Are containers shipped to an appropriate treatment, storage, and disposal facility (TSD) within 180 days (or 270 days if the TSD is more than 200 miles away)? (Sec. 262.34 (d) & 262.34(e))	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

E.	Off-Site Shipment of Hazardous Waste	YES	NO	N/A
1.	Are off-site shipments of hazardous wastes that are not covered by a reclamation agreement accompanied by a hazardous waste manifest? (Sec. 262.20)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2.	Are all hazardous waste manifests completed accurately? (Sec. 262.20)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3.	Has land disposal restriction (LDR) documentation been completed for each waste stream and for each treatment and storage facility they send waste to? (Part 268 Subpart D)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.	Are all land disposal restriction forms and FINAL SIGNED hazardous waste manifests retained for 3 years? (Sec. 268.7, 262.40(a) & 262.44(a))	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

F.	Hazardous Waste Training and Emergency Response	YES	NO	N/A
1.	Do they PERFORM TRAINING AND DOCUMENT that all personnel involved with hazardous waste management, including signing hazardous waste manifests, are trained so that they are thoroughly familiar with proper hazardous waste handling, emergency response procedures, and other job-specific hazardous waste management responsibilities of their jobs? (Note: an example of the way to document training is on page 26 of the guidance document.) (Sec. 262.34(d)(5)(iii))	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
2.	Has an emergency coordinator been established for the facility AND is he/she familiar with his/her responsibilities in that position? (Sec. 262.34(d)(5)(i))	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3.	Has emergency response information, including the locations of emergency equipment and the name and phone number of the emergency response coordinator , been posted by the telephone(s)? (Sec. 262.34(d)(5)(ii))	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.	Have they determined what emergency equipment is appropriate for their facility? (Sec. 262.34(d)(4) & 265.32)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
5.	Is adequate aisle space provided around the containers of hazardous waste to allow for unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (Note: Hazardous waste inspectors will generally consider about two feet of aisle space as being adequate.) (Sec. 262.34(d)(4) & 265.35)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

**2011 SMALL QUANTITY GENERATOR (SQG)
SELF-CERTIFICATION
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F.	Hazardous Waste Training and Emergency Response	YES	NO	N/A
6.	<p>Have emergency response arrangements, as appropriate for the type of waste handled and the potential need for services, been made with the local response organizations? (At a minimum, arrangements should be made with your local fire department.) (Sec. 262.34(d)(4) & 265.37)</p> <p>Write in the name of their fire protection district:</p> <p>Poudre Valley Fire Protection District</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.	<p>Is the facility operated in a manner that minimizes the potential for releases of hazardous waste? (Sec. 262.34(d)(4) & 265.31(a))</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

G.	Air Pollution Control	YES	NO	N/A
1.	<p>If they are required to, has their facility filed an Air Pollution Emission Notice (APEN) or been issued an air permit? (Regulation No.3, Part A, Sec. II)</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

**2011 SMALL QUANTITY GENERATOR (SQG)
SELF-CERTIFICATION
INSPECTOR CHECKLIST**

Inspector Comments (please include the Facility Name, HW transporter, and TSDF):

Date of Inspection: December 16, 2011

Facility Name: Abound Solar, Inc.

Lead Inspector: (b) (7)(C), (b) (6)

EPA ID Number: COR000216655

Hazardous Waste Transporter: Clean Harbors

Hazardous Waste Disposal Facility: Deer Trail, CO and Kimball, NE

The Facility is notified and operating as a small quantity generator (SQG) of hazardous waste.

Satellite Accumulation and 180-day Areas

On the day of the inspection the facility was managing six satellite accumulation areas (SAAs) and one 180-day accumulation area.

All seven areas were located within close proximity to each other in the main tool room where the solar panel production occurs.

Each area was visited by the inspector. All drums were properly labeled, closed, and dated as required. No violations were observed on the day of the inspection.

Document Review

The following documents were reviewed on the day of the inspection:

Manifests for 2011

Training Documentation

Emergency Response Documentation

No issues were observed during the document review.

See the inspection checklist for coverage areas.

(b) (7)(C), (b) (6)

Inspector Signature

12/16/2011

Inspection Date

ATTACHMENT 2
Notice of Inspection

Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division
4300 Cherry Creek Drive South, Mail Code: HMWMD-CP-B2, Denver, Co 80246-1530
(303) 692-3300

Notice of Inspection

Facility Name ABOUND Solar Inc.		EPA I.D.# CO000216655	Date 12-16-11
Street 4557 Denrose Court, Unit B		Inspection Arranged Prior to Inspection <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Hour In: 10:20 AM
City Fort Collins	County Larimer	Zip 80024	Hour Out: 11:30 AM
Facility Representatives (b) (7)(C), (b) (6)		Enter By: <input checked="" type="checkbox"/> Consent <input type="checkbox"/> Warrant	Agency: <input checked="" type="checkbox"/> State <input type="checkbox"/> Oversight <input type="checkbox"/> Joint
Titles EHS Specialist EHS Manager		Telephone # (b) (7)(C), (b) (6)	

CURRENT ☐ LQG, ☒ SQG, ☐ Exempt, ☐ LDF, ☐ TSF, ☐ Transporter, ☐ Non-Notifier, ☐ Transfer facility or NOTIFICATION(S) ☐ Other ☒ **To Change Status; Facility must send Letter or Revised Notification.**

Comments:

Performed a compliance evaluation inspection.

No violations observed at the time of the inspection.

Assistance Delivered During Inspection (for internal use - check ALL that apply):

Compliance Assistance:

☐ Generator Handbook ☐ Field Assistance
☐ Other guidance documents ☐ Referral to another program
☐ Change in generator status ☐ downward ☐ upward

Pollution Prevention:

☐ Guidance/Referral
☐ Field Assistance

Current Waste Minimization:

☐ Product Substitution
☐ Distillation of solvents on site
☐ Elementary Neutralization
☐ Other

Samples, Documents, Plans, and / or Photos Collected	3.
1.	
2.	4.

State personnel will review the facts established by this inspection. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged

Lead Inspector: ☒ **(b) (7)(C), (b) (6)**
Assisting Inspector(s) and Multimedia Participant(s)

(b) (7)(C), (b) (6)

Signature of Facility Representative

Enforcement Sensitive - Do not Release

EPA ID: COR000216655
Facility: ABOUOND SOLAR/AVA SOLAR
4557 DENROSE CT UNIT B
FORT COLLINS CO 80524-
Phone: 303-682-6118
Inspection Date: 12/16/11 NOI Sequence: 001
Insp. Rept Req'd?: NO Rept. Type: Offline Report
Due Date: 01/30/12
Lead Inspector: (b) (7)(C), (b) (6)

NOI Entered: (b) (7)(C), (b) (6) 12/19/11
NOI Edited: (b) (7)(C), (b) (6) / /
First Draft / /
First Review: / /
Finalized: (b) (7)(C), (b) (6) 01/27/12
Current User: (b) (7)(C), (b) (6) 12/19/11

Overall Determination: No Violation

EVALUATION TYPES: Used RCRIS Seq Nbr
CEI Compliance Evaluation YES 001

REASON CODES:
08 ERP-Inspection
SQG

COVERAGE AREAS: VIOL
GRA Haz Waste Determination NO
PTC Marking NO
PTF Condition of Containers NO
PTG Open Containers NO
PTH Incompatible Wastes NO
PTJ Container Labeling NO
PTP SQG Emergency Preparedness NO
PTQ SQG Training NO
PTS Inspections NO

LEAD INSPECTOR*: COMPLETE AFTER REPORT IS FINALIZED.

If blank No is assumed

Send Inspection Report & Photos to Facility?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Send Inspection Report to EPA?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Does Lead Inspector want the File Copy of the report, photos & letter? (If Case Development Inspection, report must go to the Lead Inspector)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Does Lead Inspector want a copy of the inspection report, photos & letter?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Oversight Inspection?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

ADMINISTRATIVE ASSISTANT ROUTING INSTRUCTIONS:

INSPECTION REPORT:	DATE & INITIAL
Original report & photos to facility file unless Inspector marked Yes or Case Development Inspection	_____
Copy of report to Tracking with this Routing Form attached if off-line report or survey.	_____
Copy of report & photos to Lead only if Inspector marked Yes.	_____
Copy of report & photos to Facility only if Inspector marked Yes.	_____
Copy or report to EPA only if Oversight is marked Yes	_____
NO VIOLATION OR GENERAL CORRESPONDENCE LETTER:	
Original letter to Facility	_____
Copy of letter to Lead only if Inspector marked Yes.	_____
Copy of letter to Facility only if Inspector marked Yes.	_____
Copy of letter to EPA if Oversight is marked Yes.	_____